

JOEL N. WERBEL>
JOHN METHFESSEL, JR.>
EDWARD L. THORNTON*>
DONALD L. CROWLEY*+
FREDRIC PAUL GALLIN*+^
STEPHEN R. KATZMAN#
WILLIAM S.BLOOM>*
ERIC L. HARRISON*+
MATTHEW A. WERBEL>

Of Counsel
JOHN METHFESSEL, SR.>

December 22, 2008

Counce

LORI BROWN STERNBACK*+ TRACY B. BUSSEL>
MARC DEMBLING*+
PAUL J. ENDLER JR.>
GERALD KAPLAN+
STEVEN A. KLUXEN^
JOHN R. KNODEL*+
MARTIN R. MCGOWAN, JR.>
CHARLES T. MCCOOK, JR. > LESLIE A. KOCH+
JARED P. KINGSLEY*+
ALLISON M. KOENKE>

TRACY B. BUSSEL>
JEANNE K. CHESTNUT^
EDWARD D DEMBLING>
MICHAEL R. EATROFF>
TIMOTHY J. FONSECA+
SCOTT V. HECK+
FRANK J. KEENAN+^
> LESLIE A. KOCH+
ALLISON M. KOENKE>
DANIELLE M. LOZITO+
ANDRES Y. MEJER+
KEITH J. MURPHY+
MATTHEW L. RACHMIEL>
WILLIAM J. RADA+
CHARLES P. SAVOTH, III>
MICHELLE M. SCHOTT>
LEONARD E. SEAMAN, III^

GINA M. STANZIALE> ADAM S. WEISS>

* Certified by the Supreme Court of New Jersey as a Civil Trial Attorney +Member of NY & NJ Bar >Member of PA & NJ Bar >Member of NJ Bar only #Member of NJ & LA. Bar %Member of MI Bar <Member of NJ and DC

Please reply to New Jersey

VIA E-FILE
VIA REGULAR MAIL
Honorable Michael A. Shipp
Clerk, United States District Court - Newark
Martin Luther King Jr.
Federal Building and U.S. Court
Newark, NJ 07101

RE: WALSH SECURITIES, INC. VS. CRISTO PROP.

Our File No. : 45987 MRM Docket No. : 2:97-CV-03496

Dear Judge Shipp:

As Your Honor is aware, Plaintiff has moved for reconsideration of certain aspects of the Court's prior Order denying plaintiff's motion to amend the complaint. The defense response to plaintiff's latest application is due today.

As I read the plaintiff's papers, and I have confirmed this with plaintiff's counsel's office, the plaintiff's motion for reconsideration is not addressed to my client, Coastal Title Agency. Rather, it is addressed to the two Title Insurance company defendants only.

That being so I will refrain from filing any opposition papers.

Thank you for your consideration in this matter.

Very truly yours, **METHFESSEL & WERBEL, ESQS.**

Martin R. McGowan mcgowan@methwerb.com Ext. 168

Zuchi Dengat

MRM:daf./rct

Methfessel & Werbel, Esqs. Our File No. 65987 MRM Page 2

VIA FACSIMILE

cc: Robert A. Magnanini, Esq.
Boies, Schiller & Flexner, LLP
150 John F. Kennedy Parkway
Short Hills, NJ 07078
Attorneys for: Walsh Securities, Inc.

Anthony M. Cicalese 74C Manatiales de Belen 200 Mtrs Norte de igleseis de Ascen San Antonio de Belen Heredia, Costa Rica Attorneys for: Anthony Cicalese

Thomas D. Flinn, Esq. Garrity, Graham, Favetta & Flinn One Lackawanna Plaza, PO Box 4205 Montclair, NJ 07042-8205 Attorneys for: Anthony Cicalese

David R. Kott, Esq.
McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
PO Box 652
Newark, NJ 07101-0652
Attorneys for: Commonwealth

Anthony Argiropoulos, Esq. Fox, Rothschild, O'Brien & Frankel, LLP Princeton Pike Corporate Center, 997 Lenox Drive, Building Lawrenceville, NJ 08648-2311 Attorneys for: Fidelity National Title Insurance Company

Irene Difeo 5 Leann Court Old Bridge, NJ 08857 Attorneys for: Irene Difeo

Anthony Argiropoulos, Esq.

Methfessel & Werbel, Esqs. Our File No. 65987 MRM Page 3

> Fox, Rothschild, O'Brien & Frankel, LLP Princeton Pike Corporate Center, 997 Lenox Drive, Building Lawrenceville, NJ 08648-2311 Attorneys for: Nations Title Insurance Company

> John B. McCusker, Esq. McCusker, Anselmi, Rosen & Carvelli 210 Park Ave, Ste 301 Florham Park NJ 07932 Attorneys for: Weichert

James C. Aaron, Esq. Ansell, Zaro, Grimm & Aaron, P.C. 1500 Lawrence Avenue CN 7807 Ocean, NJ 07712 Attorneys for: Coastal Title Agency